



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
:
EASTRIVER PARTNERS, INC., Individually :
and On Behalf of All Others Similarly :
Situating, :
:

Plaintiffs, :
:

v. :
:

FOCUS MEDIA HOLDING LIMITED, et al., :
:

Defendant. :
:

SCOTT BAUER, Individually and On Behalf :
of All Others Similarly Situated, :
:

Plaintiffs, :
:

v. :
:

FOCUS MEDIA HOLDING LIMITED, et al., :
:

Defendants. :
:
:
:
-----X

Civil Action No. 1:07-cv-10617-LTS

Civil Action No. 1:07-cv-11479-LTS

**STIPULATION AND
[PROPOSED] ORDER EXTENDING
TIME TO RESPOND TO COMPLAINTS**

It is hereby STIPULATED AND AGREED by and between the undersigned counsel for the parties as follows:

1. The time for all Defendants to respond or move against the complaints in the above-captioned actions is extended until after the Court rules on the Motion of Iron Workers Local No. 25 Pension Fund for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel (the "Motion") and a Consolidated Amended Complaint is filed.

2. Sixty (60) days after entry of an Order deciding the Motion, lead plaintiff will file a Consolidated Amended Complaint.

3. Sixty (60) days after the Consolidated Amended Complaint is filed, Defendants will either answer the Consolidated Amended Complaint or move to dismiss the Consolidated Amended Complaint.

4. If any or all of Defendants move to dismiss the Consolidated Amended Complaint, lead plaintiff will file within sixty (60) days papers opposing such motion(s). Defendants will then have thirty (30) days to reply to such opposition(s).

5. The undersigned Defendants hereby waive service of process of the complaint. All other defenses are expressly preserved.

Dated: New York, New York
February 22, 2008

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IT IS SO ORDERED:

DATED: 2/26/2008


THE HONORABLE LAURA T. SWAIN
UNITED STATES DISTRICT JUDGE 